

**UNITED STATES DISTRICT COURT FOR
THE DISTRICT COURT OF MASSACHUSETTS
BOSTON DIVISION**

STUDENTS FOR FAIR ADMISSIONS,
INC,

Plaintiff,

v.

PRESIDENT AND FELLOWS OF
HARVARD COLLEGE (HARVARD
CORPORATION),

Defendant,

and

SARAH COLE, FADHAL MOORE,
ARJINI KUMARI NAWAL, ITZEL
LIBERTAD VASQUEZ-RODRIGUEZ,
KEYANNA WIGGLESWORTH, M.B.,
K.C., Y.D., G.E., A.G., I.G., R.H.,
J.L., AND R.S.,

Proposed Defendant-
Intervenors.

Civil Action No. 1:14-cv-14176-ADB

MOTION FOR ADMISSION *PRO HAC VICE*

Pursuant to Massachusetts Local Rule 83.5.3(b), Rahsaan D. Hall, Esq., a member in good standing of the Bar of the Commonwealth of Massachusetts and the United States District Court for the District of Massachusetts, moves for the admission of Lawrence E. Culleen, a member of the District of Columbia Bar, to this Court for the purpose of representing Proposed Defendant Intervenors in the above-captioned matter, and states as follows:

1. Lawrence E. Culleen is a partner at Arnold & Porter LLP. His business address is 555 Twelfth Street, NW, Washington, D.C. 20004 and his telephone number is (202) 942-5477.

2. Lawrence E. Culleen is a member in good standing of the District of Columbia Bar, as evidenced by the Certificate of Good Standing attached hereto as Exhibit A. There are no disciplinary proceedings pending against him as a member of the bar in any jurisdiction. See Affidavit of Lawrence E. Culleen, attached hereto as Exhibit B.

3. Lawrence E. Culleen is familiar with the applicable provisions of the Local Rules of the United States District Court for the District of Massachusetts.

4. Rahsaan D. Hall, a member of the Bar of the Commonwealth of Massachusetts and the United States District Court for the District of Massachusetts, will continue to represent Proposed Defendant Intervenor if this motion is granted.

5. Pursuant to Local Rule 7.1(a), Proposed Defendant Intervenor have conferred with counsel for the Plaintiff and Defendant and they have no objection to granting this motion.

WHEREFORE, the Defendant Intervenor respectfully request that Lawrence E. Culleen be admitted to practice before this Court *pro hac vice* for the purpose of appearing as counsel for Proposed Defendant Intervenor in the above referenced proceeding in accordance with the Rules of this Court.

Respectfully submitted,

Dated: May 20, 2015

/s/ Rahsaan D. Hall

Rahsaan D. Hall, BBO # 645369
rhall@lawyerscom.org
LAWYERS' COMMITTEE FOR CIVIL RIGHTS
AND ECONOMIC JUSTICE
294 Washington St. Suite 443
Boston, MA 02108
Tel: (617) 988-0608

Lawrence E. Culleen, D.C. Bar # 366854
Lawrence.Culleen@aporter.com
ARNOLD & PORTER LLP
555 Twelfth Street, NW
Washington, DC 20004-1206
Tel: (202) 942-5477

CERTIFICATE OF SERVICE

In accordance with Local Rule 5.2(b), I, Rahsaan D. Hall, hereby certify that this document filed through the ECF system on May 20, 2015 will be sent electronically to the registered participants as identified on the Notice of Electronic Filing.

/s/ Rahsaan D. Hall

Rahsaan D. Hall, Esq.